

# **EXHIBIT R**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

COAST TO COAST TITLE, LLC, et al.,

Plaintiffs

v.

TYRRELL L. GARTH, et al.,

Defendants.

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Civil Action No. 4:24-cv-02767

**DECLARATION OF FIELDS ALEXANDER**

My name is Fields Alexander. I am more than twenty-one years of age. I am of sound mind and competent to make this Declaration. I have personal knowledge of the facts stated herein, and I can attest that they are true and correct.

1. I am a partner at the law firm of Beck Redden LLP, located at 1221 McKinney Street, Suite 4500, Houston, Texas 77010-2010. I am the attorney-in-charge of the representation for Defendants Tyrrell L. Garth and Phillip H. Clayton in the above-captioned matter.

2. I am a licensed attorney in the State of Texas, and I have personal knowledge of the fees and expenses billed by Beck Redden and incurred by Messrs. Garth and Clayton for our work in defending the claims asserted against them and in pursuing the attached Motion for Sanctions.

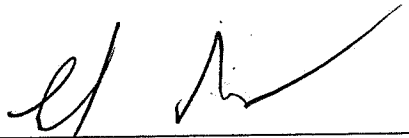
3. Through the end of February 2025, Messrs. Garth and Clayton have incurred over \$150,000 in defending Plaintiffs' claims. I anticipate they will incur at least an additional \$30,000 in fees from March 1, 2025 through the conclusion of this matter, assuming the claims against

Messrs. Garth and Clayton are dismissed following the Court's consideration of their Motion to Dismiss Plaintiffs' Second Amended Complaint.

**JURAT**

My name is Fields Alexander, my date of birth is May 20, 1966, and my address is 1221 McKinney Street, Suite 4500, Houston, Texas 77010. I declare under penalty of perjury that the foregoing is true and correct.

Executed in Harris County, State of Texas on the 21st day of March, 2025.

  
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Fields Alexander, Declarant